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STATE OF FLORIDA  
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

Site:	
Break:	4.10
Other:	

SOUTH  
SUPERFUND

MAY 17 10 40 AM '95

REMEDIAL  
BRANCH

4796

May 10, 1995

Randy Bryant  
Senior Remedial Project Manager  
South Superfund Remedial Branch  
EPA Region IV  
345 Courtland Street, N.E.  
Atlanta, GA 30365

Dear Mr. Bryant:

Thank you for the opportunity to comment on the draft Proposed Plan and draft Record of Decision for the Chevron Chemical Superfund NPL site in Orlando, Florida. Since we are unaware of any current human use of the contaminated ground water at or near the site, we support alternative #2: natural attenuation and monitoring. We would caution, however, against any remediation that disturbs the on-site soil and exposes nearby residents to pesticide-contaminated dust. In addition we recommend:

1. EPA require Chevron to continue to restrict site access. The fence and warning signs have been effective in limiting public access to the site.
2. EPA require Chevron to maintain a vegetative (grass) cover on the site to prevent migration of pesticide-contaminated dust to nearby residences.
3. EPA recommend to the St. Johns River Water Management District that they do **not** permit any new wells in the area of contaminated ground water. Currently, there are no restrictions on the installation and use of new wells in this area. We do not know of anyone using contaminated ground water, but feel this restriction would provide an additional safeguard to human health.

At a minimum, the restricted area should include the Chevron Chemical NPL site, the Armstrong Trailer Park and the 441 Trailer Park. This is based on detection of following chemicals in off-site monitor wells 1S, 1D, 2S, 2D, and 6S:

benzene  
lead

ethyl benzene  
chromium

alpha and beta BHC  
1,4-dichlorobenzene

The concentrations of benzene in these off-site wells exceed the Florida Maximum Contaminant Level (MCL) for drinking water (Section 4.3, Vol. 1, May 1994 Remedial Investigation Report). The Florida Department of Health and Rehabilitative Services will also make this recommendation to the water management district.

The above recommendations are contained in our draft public health assessment report. I've attached a copy of the summary, conclusions, and recommendations from this report for your information. The final version of this report should be available in the next few weeks. I'll send you a final copy as soon as it is available. Thanks again for the opportunity to comment on the draft Proposed Plan and the draft Record of Decision.

Sincerely,

*Randy Merchant*

E. Randall Merchant  
Biological Administrator  
Environmental Toxicology  
(904) 488-3385

ERM/erm

Attachment

cc: Richard Kauffman - ATSDR  
Bob Safay - ATSDR  
Dan DiDomenico - DEP  
Allen Hubbard - DEP  
Joyce Bittle - Orange CPHU